

EXHIBIT 24

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 22 *Sharp Electronics Manufacturing Company of America, Inc.*

23 **UNITED STATES DISTRICT COURT**
 24 **NORTHERN DISTRICT OF CALIFORNIA**
 25 **SAN FRANCISCO DIVISION**

26 IN RE: CATHODE RAY TUBE (CRT)
 27 ANTITRUST LITIGATION

Case No.: 3:07-cv-5944-SC
 MDL NO.: 1917

28 This Document Relates To:

Case No. 13-cv-01173 SC
 Case No. 13-cv-02776 SC

Sharp Electronics Corp., et al. v. Hitachi Ltd., et al.
Sharp Electronics Corp., et al. v. Koninklijke Philips
Electronics N.V., et al.

**RESPONSE TO PHILIPS
 ELECTRONICS NORTH AMERICA
 CORPORATION'S FIRST SET OF
 INTERROGATORIES TO SHARP
 ELECTRONICS CORPORATION
 AND SHARP ELECTRONICS
 MANUFACTURING COMPANY OF
 AMERICA, INC.**

PROPOUNDING PARTY: Defendant Philips Electronics North America Corporation

RESPONDING PARTIES: Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.

SET NO: One

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Rule 33.1 of the Local Rules of the Northern District of California, Plaintiffs Sharp Electronics Corporation (“SEC”) and Sharp Electronics Manufacturing Company of America, Inc. (“SEMA”) (collectively, “Sharp”) hereby respond to Defendant Philips Electronics North America Corporation’s (“PENAC”) First Set of Interrogatories, dated August 1, 2014 (the “Interrogatories”) as follows:

GENERAL OBJECTIONS

The following general objections (“General Objections”) are incorporated in Sharp’s responses (“Responses”) to each and every interrogatory contained in the Interrogatories. No Response to any interrogatory shall be deemed a waiver of Sharp’s General Objections.

1. Sharp objects to the Interrogatories and the instructions therein to the extent that they seek to impose obligations on Sharp beyond those imposed by the Federal Rules of Civil Procedure, the Local Civil Rules of the Northern District of California, or any applicable order of the Court.
2. Sharp objects to the Interrogatories on the grounds that they are improperly being used as a discovery device, are oppressive, unduly burdensome and violate the rule of proportionality embodied in Federal Rule of Civil Procedure 26(b)(2)(C).
3. Sharp objects to the Interrogatories to the extent that they seek or call for information that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants from public sources.
4. Sharp objects to the Interrogatories to the extent that they seek or call for information that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants from others.
5. Sharp objects to the Interrogatories to the extent that they seek information that is neither relevant to this litigation, nor reasonably calculated to lead to the discovery of admissible

1 evidence. Further, these Responses and Objections are without prejudice to, and not a waiver of,
2 Sharp's right to contend at trial or otherwise in this action that such information is irrelevant,
3 immaterial, inadmissible, or not a proper basis for discovery, nor any objection by Sharp to any
4 future use of such information.

5 6. Sharp objects to the Interrogatories to the extent that they are unintelligible, vague,
6 ambiguous, overly broad, unduly burdensome, and oppressive.

7 7. Sharp objects to the Interrogatories to the extent that they seek or call for information not
8 in Sharp's possession, custody, or control.

9 8. Documents produced by Sharp in this litigation shall be deemed produced in response to
10 these Interrogatories, subject to the Responses and Objections contained herein. The burden of
11 identifying specific information or documents responsive to these Interrogatories from documents
12 produced in the course of this litigation is substantially the same for either party, and Sharp is
13 entitled to elect the option to produce business records pursuant to Rule 33(d) of the Federal
14 Rules of Civil Procedure.

15 9. Sharp objects to the Interrogatories to the extent that they seek or call for information or
16 documents protected from disclosure by the attorney-client privilege, the attorney work product
17 doctrine, or any other privilege, protection, or immunity applicable under the governing law. Any
18 information disclosed pursuant to the Interrogatories will be disclosed without waiving, but on the
19 contrary reserving and intending to reserve, each of these privileges, protections, or immunities.
20 Any accidental disclosure of privileged information or material shall not be deemed a waiver of
21 the applicable privilege, protection, or immunity.

22 10. Sharp objects to the Interrogatories to the extent that they are duplicative and/or
23 cumulative, either internally of themselves or of discovery previously propounded to Sharp by
24 other defendants in this matter. Each such Interrogatory violates Section XV, subsections D and
25 E, of the Court's "Order Re: Discovery and Case Management Protocol," entered on April 3,
26 2012. Order Re: Discovery and Case Management Protocol, *In re Cathode Ray Tube Antitrust*
27 *Litigation*, Case No. 07-cv-05944-SC, MDL No. 1917 (N.D. Cal. Apr. 3, 2012) (MDL Dkt. No.
28 1128).

11. Sharp objects to the Interrogatories to the extent they violate orders of the Court or the Special Master in this case, including the Special Master's Report and Recommendation on the Defendants' Motion to Compel, dated August 18, 2014.

12. Sharp objects to the Interrogatories to the extent that they call for expert testimony and states that Sharp will provide expert disclosures as provided by the Federal Rules of Civil Procedure and the orders of the Court.

13. Sharp objects to the Interrogatories to the extent that they call for speculation or call for a conclusion on an issue of law.

14. Sharp objects to the Interrogatories to the extent they seek information about contentions or call for all evidence or all information in support of allegations or contentions. Such Interrogatories are premature; Sharp has not completed its discovery and preparation in this matter, and its investigation of this case is ongoing. These responses are being made after reasonable inquiry into the relevant facts, and are based only upon the information and documentation that is presently known to Sharp. Further investigation and discovery may result in the identification of additional information or contentions, and Sharp reserves the right to supplement and modify its responses. Sharp's responses should not be construed to prejudice its right to conduct further investigation in this case, or to limit Sharp's use of any additional evidence that may be developed.

15. Sharp objects to, and expressly disclaims, any need or intent to prove any facts listed herein as a prerequisite to proving its claims at trial.

16. Sharp reserves its right to try its case as it determines is best at trial. This includes by not using facts or information stated herein or using facts or information in addition to those stated herein.

17. Sharp's responses will be subject to the Stipulated Protective Order entered in this action (MDL Dkt. No. 306).

18. Sharp objects to the Interrogatories to the extent they contain any incidental or implied admission of fact or law. Sharp's responses to all or any part of any Interrogatory should not be taken as an incidental or implied admission, agreement, or concurrence that: (i) Sharp accepts or

1 admits an express or implied assumption of fact set forth in or assumed by the Interrogatory; (ii)
2 Sharp accepts or admits any express or implied assumption of law set forth in or assumed by the
3 Interrogatory; (iii) Sharp has in its possession, custody or control documents or information
4 responsive to that Interrogatory; or (iv) documents or information responsive to that Interrogatory
5 exist.

6 19. Sharp reserves its right to object to and/or challenge any evidence on grounds of
7 competency, relevance, materiality, privilege, or admissibility at trial or at any hearing or
8 proceeding with respect to any admissions sought by the Interrogatories and all answers Plaintiffs
9 provide in response to these Interrogatories.

10 20. Sharp objects to the Interrogatories to the extent that they are compound and/or contain
11 discrete subparts in violation of Federal Rule of Civil Procedure 33(a)(1).

12 21. Sharp objects to Definition A because the construction of “All” to include “all, each, any,
13 and every” is vague, ambiguous, and confusing, and likely to create multiple, contradictory
14 meanings from the same language. Sharp further objects to the definition of “All” as not
15 reasonably limited in scope or time. Sharp uses “all” according to its ordinary meaning.

16 22. Sharp objects to Definition B because the construction of “‘and’ and ‘or’” is vague,
17 ambiguous, and confusing, and likely to create multiple, contradictory meanings from the same
18 language. Sharp uses “and” and “or” according to their ordinary meanings.

19 23. Sharp objects to Definition H to the extent that it mischaracterizes and is inconsistent with
20 the definition in the Complaint. For purposes of these responses only, Sharp shall use the term
21 “CRT Product(s)” to mean electronic devices containing CDTs (such as monitors) and containing
22 CPTs (such as televisions).

23 24. Sharp objects to Definition I as vague, ambiguous, and unreasonably broad and,
24 depending upon Defendants’ meaning, potentially calling for a legal conclusion. Sharp also
25 objects to Definition I to the extent that it calls for documents that are subject to the attorney-
26 client privilege, the work product doctrine, other applicable privilege, or are not in Sharp’s
27 possession, custody or control.
28

25. Sharp objects to Definition L because it is overly broad, unduly burdensome, and oppressive insofar as it requires that Sharp identify and locate numerous individuals involved in thousands of discrete purchases made over the course of more than 12 years, dating back to 1995. Sharp also objects to Definition L with respect to identifying persons and identifying events or occurrences to the extent that it calls for information beyond Sharp's possession, custody or control. Moreover, virtually all of the individuals responsive to these requests are current or former employees of PENAC or its affiliates and co-conspirators, and that information is therefore fully known to PENAC or is otherwise discoverable by less burdensome methods.

26. Sharp objects to Definition FF as overly broad, vague, and not reasonably calculated to lead to the discovery of admissible evidence. In responding to the Interrogatories directed to "You" or "Your," Sharp will respond for the Plaintiffs SEC and SEMA and persons acting on their behalf.

27. Sharp objects to Definition No. GG because it is vague, ambiguous, and confusing and likely to create multiple, contradictory meanings from the same language. Sharp refers to singular and plural nouns according to their ordinary meanings.

28. Sharp objects to Definition No. HH because it is vague, ambiguous, and confusing and likely to create multiple, contradictory meanings from the same language. Sharp uses the present and past tenses according to their ordinary meanings.

29. Sharp objects to Instruction No. 1 to the extent that it calls for information that is the subject of the attorney-client privilege, the work product doctrine, or any other applicable privilege, or is not in Plaintiffs' possession, custody or control.

RESPONSES TO INTERROGATORIES

Request No. 1:

Describe in detail and in narrative form (including by Identifying each Document, Person or other evidentiary source that You rely upon) the factual basis for your allegation that LGEI "dominated and/or controlled the finances, policies and affairs of LGETT relating to the antitrust violations alleged," as alleged in paragraph 80 of the Amended Complaint.

Response to Request No. 1:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory on the grounds that it is vague and ambiguous because the acronyms “LGEI” and “LGETT” are not defined in the Interrogatories. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendants, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp further objects to this Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects that this Interrogatory improperly requires Sharp to marshal evidence in support of its case in response to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other discovery propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to a specific LG entity when all of the LG entities named as co-conspirators were owned and controlled and acted pursuant to the overall strategy and direction of LG Electronics, Inc. Sharp also objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int’l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this Interrogatory calls for expert testimony. Sharp also objects to the

1 extent that this Interrogatory calls for information that is covered by attorney-client privilege or
2 the work product protection. Sharp further states that it has not completed its discovery and
3 preparation in this matter and that its investigation of the case is ongoing, and Sharp reserves its
4 right to supplement or amend its response to this Interrogatory consistent with Federal Rule of
5 Civil Procedure 26(e).

6 Subject to and without waiving the foregoing objections, Sharp states that the response to
7 this Interrogatory may include the transactional data and documents produced by defendants, co-
8 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
9 responsive to this Interrogatory from review of the documents and data identified in this response
10 is substantially the same for either Sharp or PENAC. Sharp further states that information
11 responsive to this Interrogatory is contained in the following, which are incorporated here by
12 reference:

- 13 • Exhibit A to these Responses;
- 14 • Attachment A to these Responses;
- 15 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
16 materials;
- 17 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
18 accompanying materials;
- 19 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 20 • the transcript of and exhibits introduced during the deposition of Choong Ryul Park
21 (July 9, 2012);
- 22 • the transcript of and exhibits introduced during the deposition of Mok Hyeon Seong
23 (July 9, 2012);
- 24 • the transcript of and exhibits introduced during the deposition of Yun Sok Lee (July
25 11, 2012);
- 26 • the transcript of and exhibits introduced during the deposition of Kyung Tae Kwon
27 (July 13, 2012);
- 28

- 1 • the transcript of and exhibits introduced during the deposition of Pil Jae Lee (July 16-
2 17, 2013);
- 3 • the transcript of and exhibits introduced during the deposition of Jin Kang Chung (July
4 19-20, 2013);
- 5 • the transcript of and exhibits introduced during the deposition of Duk Chul Ryu
6 (January 15-17, 2014); and
- 7 • LG Electronics, Inc. and LG Electronics U.S.A., Inc.'s Objections and Responses to
8 Direct Action Plaintiffs' First Set of Interrogatories (July 10, 2014).

9 **Request No. 2:**

10 Describe in detail and in narrative form (including by Identifying each Document, Person
11 or other evidentiary source that You rely upon) the factual basis for your allegation that MTPD
12 "dominated and/or controlled the finances, policies and affairs of MTPD relating to the antitrust
13 violations alleged," as alleged in paragraph 81 of the Amended Complaint.

14 **Response to Request No. 2:**

15 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
16 objects to this Interrogatory on the grounds that it is unintelligible, vague, and ambiguous because
17 it asks Sharp to describe the factual basis for an allegation that *MTPD* "dominated and/or
18 controlled the finances, policies, and affairs of MTPD," which mischaracterizes the allegations in
19 paragraph 81 of the Complaint.

20 **Request No. 3:**

21 Describe in detail and in narrative form (including by Identifying each Document, Person
22 or other evidentiary source that You rely upon) the factual basis for your allegation that Samsung
23 SDI Co., Ltd. "dominated and/or controlled the finances, policies and affairs of Samsung
24 Elektronische Baulemente relating to the antitrust violations alleged," as alleged in paragraph 82
25 of the Amended Complaint.

26 **Response to Request No. 3:**

27 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
28 also objects to this Interrogatory to the extent that it calls for information that is already in the

1 possession, custody, or control of Defendants, or that can equally or more readily, conveniently,
2 and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this
3 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on
4 Sharp to state its entire case on an incomplete record and review and analyze all information
5 obtained in discovery thus far at this stage of this litigation. Sharp further objects to this
6 Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects
7 that this Interrogatory improperly requires Sharp to marshal evidence in support of its case in
8 response to written discovery, but particularly while discovery is ongoing and in advance of the
9 applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects
10 to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome,
11 and oppressive, and on the grounds that it is cumulative and duplicative of other discovery
12 propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case
13 Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as
14 requiring the attribution of a particular action to a specific Samsung entity when all of the
15 Samsung entities named as co-conspirators were owned and controlled and acted pursuant to the
16 overall strategy and direction of Samsung SDI Co., Ltd. Sharp also objects to this Interrogatory
17 on the grounds that it seeks, in contravention to well-established legal principles, to dismember
18 the overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
19 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
20 *Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
21 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
22 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
23 law, the action of all. *Id.* Sharp further objects to the extent this Interrogatory calls for expert
24 testimony. Sharp also objects to the extent that this Interrogatory calls for information that is
25 covered by attorney-client privilege or the work product protection. Sharp further states that it
26 has not completed its discovery and preparation in this matter and that its investigation of the case
27 is ongoing, and Sharp reserves its right to supplement or amend its response to this Interrogatory
28 consistent with Federal Rule of Civil Procedure 26(e).

1 Subject to and without waiving the foregoing objections, Sharp states that the response to
2 this Interrogatory may include the transactional data and documents produced by defendants, co-
3 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
4 responsive to this Interrogatory from review of the documents and data identified in this response
5 is substantially the same for either Sharp or PENAC. Sharp further states that information
6 responsive to this Interrogatory is contained in the following, which are incorporated here by
7 reference:

- 8 • Exhibit A to these Responses;
- 9 • Attachment A to these Responses;
- 10 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
11 materials;
- 12 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
13 accompanying materials;
- 14 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 15 • the transcript of and exhibits introduced during the deposition of Jae In Lee (June 7,
16 2012; July 24-26, 2013);
- 17 • the transcript of and exhibits introduced during the deposition of In Hwan Song
18 (December 12-14, 2012);
- 19 • the transcript of and exhibits introduced during the deposition of Dae Eui Lee (January
20 16-18, 2013);
- 21 • the transcript of and exhibits introduced during the deposition of Michael Son
22 (February 5-6, 2013);
- 23 • the transcript of and exhibits introduced during the deposition of Hun Sul Chu
24 (February 11-13, 2013);
- 25 • the transcript of and exhibits introduced during the deposition of Sang Kyu Park
26 (March 20-22, 2013);
- 27 • the transcript of and exhibits introduced during the deposition of Deok-Yun Kim
28 (March 27-29, 2013);

- 1 • the transcript of and exhibits introduced during the deposition of Hoon Choi (June 19-
2 21, 2013);
- 3 • the transcript of and exhibits introduced during the deposition of Jun Yeol Youn
4 (September 11-12, 2013);
- 5 • the transcript of and exhibits introduced during the deposition of Kyung Chul Oh
6 (November 19-22, 2013);
- 7 • the transcript of and exhibits introduced during the deposition of Sung Kook Sung
8 (March 18-20, 2014);
- 9 • the transcript of and exhibits introduced during the deposition of W.R. Kim (July 2,
10 2014);
- 11 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
12 Interrogatories (May 12, 2010);
- 13 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
14 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 15 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
16 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 17 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
18 (November 25, 2013); and
- 19 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
20 Admission (November 25, 2013).

21 **Request No. 4:**

22 Describe in detail and in narrative form (including by Identifying each Document, Person
23 or other evidentiary source that You rely upon) the factual basis for your allegation that
24 LG.Philips Displays Holding B.V. "dominated and/or controlled the finances, policies and affairs
25 of LG.Philips Displays relating to the antitrust violations alleged," as alleged in paragraph 90 of
26 the Amended Complaint.

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Response to Request No. 4:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendants, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp further objects to this Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects that this Interrogatory improperly requires Sharp to marshal evidence in support of its case in response to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other discovery propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to a specific LPD entity when all of the LPD entities named as co-conspirators were owned and controlled and acted pursuant to the overall strategy and direction of LG.Philips Displays. Sharp also objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this Interrogatory calls for expert testimony. Sharp also objects to the extent that this Interrogatory calls for information that is covered by attorney-client privilege or the work product protection. Sharp further states that it

1 has not completed its discovery and preparation in this matter and that its investigation of the case
2 is ongoing, and Sharp reserves its right to supplement or amend its response to this Interrogatory
3 consistent with Federal Rule of Civil Procedure 26(e).

4 Subject to and without waiving the foregoing objections, Sharp states that the response to
5 this Interrogatory may include the transactional data and documents produced by defendants, co-
6 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
7 responsive to this Interrogatory from review of the documents and data identified in this response
8 is substantially the same for either Sharp or PENAC. Sharp further states that information
9 responsive to this Interrogatory is contained in the following, which are incorporated here by
10 reference:

- 11 • Exhibit A to these Responses;
 - 12 • Attachment A to these Responses;
 - 13 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
14 materials;
 - 15 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
16 accompanying materials;
 - 17 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
 - 18 • the transcript of and exhibits introduced during the deposition of Choong Ryul Park
19 (July 9, 2012);
 - 20 • the transcript of and exhibits introduced during the deposition of Mok Hyeon Seong
21 (July 9, 2012);
 - 22 • the transcript of and exhibits introduced during the deposition of Yun Sok Lee (July
23 11, 2012);
 - 24 • the transcript of and exhibits introduced during the deposition of Kyung Tae Kwon
25 (July 13, 2012);
 - 26 • the transcript of and exhibits introduced during the deposition of Pil Jae Lee (July 16-
27 17, 2013);
- 28

- 1 • the transcript of and exhibits introduced during the deposition of Jin Kang Chung (July
- 2 19-20, 2013);
- 3 • the transcript of and exhibits introduced during the deposition of Duk Chul Ryu
- 4 (January 15-17, 2014);
- 5 • the transcript of and exhibits introduced during the deposition of Roger de Moor (July
- 6 31-August 1, 2012);
- 7 • the transcript of and exhibits introduced during the deposition of Pil Jae Lee (July 16-
- 8 17, 2013);
- 9 • the transcript of and exhibits introduced during the deposition of Jim Smith
- 10 (December 12-13, 2013);
- 11 • the transcript of and exhibits introduced during the deposition of Wiebo Vaartjes
- 12 (December 18-19, 2013);
- 13 • the transcript of and exhibits introduced during the deposition of Patrick Canavan
- 14 (January 30-31, 2014);
- 15 • the transcript of and exhibits introduced during the deposition of Robert O'Brien
- 16 (March 20-21, 2014);
- 17 • the transcript of and exhibits introduced during the deposition of Joseph Killen (May
- 18 15, 2014);
- 19 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 20 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 21 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 22 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 23 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 24 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 25 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 26 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 27 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 28 of Interrogatories (July 10, 2014); and

- Philips Electronics North America Corporation's Responses to Direct Action Plaintiffs' First Set of Interrogatories (July 10, 2014).

Request No. 5:

Describe in detail and in narrative form (including by Identifying each Document, Person or other evidentiary source that You rely upon) the factual basis for your allegation that LG.Philips Displays Holding B.V. "dominated and/or controlled the finances, policies and affairs of LG.Philips Shuguang relating to the antitrust violations alleged," as alleged in paragraph 91 of the Amended Complaint.

Response to Request No. 5:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendants, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp further objects to this Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects that this Interrogatory improperly requires Sharp to marshal evidence in support of its case in response to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other discovery propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to a specific LPD entity when all of the LPD entities named as co-conspirators were owned and controlled and acted pursuant to the overall strategy and direction of LG.Philips Displays. Sharp also objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to dismember the

1 overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
2 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
3 *Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
4 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
5 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
6 law, the action of all. *Id.* Sharp further objects to the extent this Interrogatory calls for expert
7 testimony. Sharp also objects to the extent that this Interrogatory calls for information that is
8 covered by attorney-client privilege or the work product protection. Sharp further states that it
9 has not completed its discovery and preparation in this matter and that its investigation of the case
10 is ongoing, and Sharp reserves its right to supplement or amend its response to this Interrogatory
11 consistent with Federal Rule of Civil Procedure 26(e).

12 Subject to and without waiving the foregoing objections, Sharp states that the response to
13 this Interrogatory may include the transactional data and documents produced by defendants, co-
14 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
15 responsive to this Interrogatory from review of the documents and data identified in this response
16 is substantially the same for either Sharp or PENAC. Sharp further states that information
17 responsive to this Interrogatory is contained in the following, which are incorporated here by
18 reference:

- 19 • Exhibit A to these Responses;
- 20 • Attachment A to these Responses;
- 21 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
22 materials;
- 23 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
24 accompanying materials;
- 25 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 26 • Deposition of Choong Ryul Park (July 9, 2012);
- 27 • Deposition of Mok Hyeon Seong (July 9, 2012);
- 28 • Deposition of Yun Sok Lee (July 11, 2012);

- 1 • the transcript of and exhibits introduced during the deposition of Kyung Tae Kwon
- 2 (July 13, 2012);
- 3 • the transcript of and exhibits introduced during the deposition of Pil Jae Lee (July 16-
- 4 17, 2013);
- 5 • the transcript of and exhibits introduced during the deposition of Jin Kang Chung (July
- 6 19-20, 2013);
- 7 • the transcript of and exhibits introduced during the deposition of Duk Chul Ryu
- 8 (January 15-17, 2014);
- 9 • the transcript of and exhibits introduced during the deposition of Roger de Moor (July
- 10 31-August 1, 2012);
- 11 • the transcript of and exhibits introduced during the deposition of Pil Jae Lee (July 16-
- 12 17, 2013);
- 13 • the transcript of and exhibits introduced during the deposition of Jim Smith
- 14 (December 12-13, 2013);
- 15 • the transcript of and exhibits introduced during the deposition of Wiebo Vaartjes
- 16 (December 18-19, 2013);
- 17 • the transcript of and exhibits introduced during the deposition of Patrick Canavan
- 18 (January 30-31, 2014);
- 19 • the transcript of and exhibits introduced during the deposition of Robert O'Brien
- 20 (March 20-21, 2014);
- 21 • the transcript of and exhibits introduced during the deposition of Joseph Killen (May
- 22 15, 2014);
- 23 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 24 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 25 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 26 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 27 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 28 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);

- 1 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 2 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 3 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 4 of Interrogatories (July 10, 2014); and
- 5 • Philips Electronics North America Corporation's Responses to Direct Action
- 6 Plaintiffs' First Set of Interrogatories (July 10, 2014).

7 **Request No. 6:**

8 Describe in detail and in narrative form (including by Identifying each Document, Person
9 or other evidentiary source that You rely upon) the factual basis for your allegation that
10 LG.Philips "dominated and/or controlled the finances, policies and affairs of LG.Philips
11 Singapore relating to the antitrust violations alleged," as alleged in paragraph 92 of the Amended
12 Complaint.

13 **Response to Request No. 6:**

14 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
15 also objects to this Interrogatory to the extent that it calls for information that is already in the
16 possession, custody, or control of Defendants, or that can equally or more readily, conveniently,
17 and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this
18 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on
19 Sharp to state its entire case on an incomplete record and review and analyze all information
20 obtained in discovery thus far at this stage of this litigation. Sharp further objects to this
21 Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects
22 that this Interrogatory improperly requires Sharp to marshal evidence in support of its case in
23 response to written discovery, but particularly while discovery is ongoing and in advance of the
24 applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects
25 to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome,
26 and oppressive, and on the grounds that it is cumulative and duplicative of other discovery
27 propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case
28 Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as

1 requiring the attribution of a particular action to a specific LPD entity when all of the LPD
2 entities named as co-conspirators were owned and controlled and acted pursuant to the overall
3 strategy and direction of LG.Philips Displays. Sharp also objects to this Interrogatory on the
4 grounds that it seeks, in contravention to well-established legal principles, to dismember the
5 overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
6 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
7 *Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
8 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
9 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
10 law, the action of all. *Id.* Sharp further objects to the extent this Interrogatory calls for expert
11 testimony. Sharp also objects to the extent that this Interrogatory calls for information that is
12 covered by attorney-client privilege or the work product protection. Sharp further states that it
13 has not completed its discovery and preparation in this matter and that its investigation of the case
14 is ongoing, and Sharp reserves its right to supplement or amend its response to this Interrogatory
15 consistent with Federal Rule of Civil Procedure 26(e).

16 Subject to and without waiving the foregoing objections, Sharp states that the response to
17 this Interrogatory may include the transactional data and documents produced by defendants, co-
18 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
19 responsive to this Interrogatory from review of the documents and data identified in this response
20 is substantially the same for either Sharp or PENAC. Sharp further states that information
21 responsive to this Interrogatory is contained in the following, which are incorporated here by
22 reference:

- 23 • Exhibit A to these Responses;
- 24 • Attachment A to these Responses;
- 25 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
26 materials;
- 27 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
28 accompanying materials;

- Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- the transcript of and exhibits introduced during the deposition of Choong Ryul Park (July 9, 2012);
- the transcript of and exhibits introduced during the deposition of Mok Hyeon Seong (July 9, 2012);
- the transcript of and exhibits introduced during the deposition of Yun Sok Lee (July 11, 2012);
- the transcript of and exhibits introduced during the deposition of Kyung Tae Kwon (July 13, 2012);
- the transcript of and exhibits introduced during the deposition of Pil Jae Lee (July 16-17, 2013);
- the transcript of and exhibits introduced during the deposition of Jin Kang Chung (July 19-20, 2013);
- the transcript of and exhibits introduced during the deposition of Duk Chul Ryu (January 15-17, 2014);
- the transcript of and exhibits introduced during the deposition of Roger de Moor (July 31-August 1, 2012);
- the transcript of and exhibits introduced during the deposition of Pil Jae Lee (July 16-17, 2013);
- the transcript of and exhibits introduced during the deposition of Jim Smith (December 12-13, 2013);
- the transcript of and exhibits introduced during the deposition of Wiebo Vaartjes (December 18-19, 2013);
- the transcript of and exhibits introduced during the deposition of Patrick Canavan (January 30-31, 2014);
- the transcript of and exhibits introduced during the deposition of Robert O'Brien (March 20-21, 2014);

- 1 • the transcript of and exhibits introduced during the deposition of Joseph Killen (May
- 2 15, 2014);
- 3 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 4 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 5 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 6 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 7 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 8 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 9 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 10 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 11 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 12 of Interrogatories (July 10, 2014); and
- 13 • Philips Electronics North America Corporation's Responses to Direct Action
- 14 Plaintiffs' First Set of Interrogatories (July 10, 2014).

Request No. 7:

15 Describe in detail and in narrative form (including by Identifying each Document, Person
16 or other evidentiary source that You rely upon) the factual basis for your allegation that
17 LG.Philips Displays International B.V. "dominated and/or controlled the finances, policies and
18 affairs of PT.LP Indonesia relating to the antitrust violations alleged," as alleged in paragraph 93
19 of the Amended Complaint.
20

Response to Request No. 7:

21 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
22 also objects to this Interrogatory to the extent that it calls for information that is already in the
23 possession, custody, or control of Defendants, or that can equally or more readily, conveniently,
24 and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this
25 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on
26 Sharp to state its entire case on an incomplete record and review and analyze all information
27 obtained in discovery thus far at this stage of this litigation. Sharp further objects to this
28

1 Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects
2 that this Interrogatory improperly requires Sharp to marshal evidence in support of its case in
3 response to written discovery, but particularly while discovery is ongoing and in advance of the
4 applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects
5 to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome,
6 and oppressive, and on the grounds that it is cumulative and duplicative of other discovery
7 propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case
8 Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as
9 requiring the attribution of a particular action to a specific LPD entity when all of the LPD
10 entities named as co-conspirators were owned and controlled and acted pursuant to the overall
11 strategy and direction of LG.Philips Displays. Sharp also objects to this Interrogatory on the
12 grounds that it seeks, in contravention to well-established legal principles, to dismember the
13 overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
14 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
15 *Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
16 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
17 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
18 law, the action of all. *Id.* Sharp further objects to the extent this Interrogatory calls for expert
19 testimony. Sharp also objects to the extent that this Interrogatory calls for information that is
20 covered by attorney-client privilege or the work product protection. Sharp further states that it
21 has not completed its discovery and preparation in this matter and that its investigation of the case
22 is ongoing, and Sharp reserves its right to supplement or amend its response to this Interrogatory
23 consistent with Federal Rule of Civil Procedure 26(e).

24 Subject to and without waiving the foregoing objections, Sharp states that the response to
25 this Interrogatory may include the transactional data and documents produced by defendants, co-
26 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
27 responsive to this Interrogatory from review of the documents and data identified in this response
28 is substantially the same for either Sharp or PENAC. Sharp further states that information

1 responsive to this Interrogatory is contained in the following, which are incorporated here by
2 reference:

- 3 • Exhibit A to these Responses;
- 4 • Attachment A to these Responses;
- 5 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
6 materials;
- 7 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
8 accompanying materials;
- 9 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 10 • the transcript of and exhibits introduced during the deposition of Choong Ryul Park
11 (July 9, 2012);
- 12 • the transcript of and exhibits introduced during the deposition of Mok Hyeon Seong
13 (July 9, 2012);
- 14 • the transcript of and exhibits introduced during the deposition of Yun Sok Lee (July
15 11, 2012);
- 16 • the transcript of and exhibits introduced during the deposition of Kyung Tae Kwon
17 (July 13, 2012);
- 18 • the transcript of and exhibits introduced during the deposition of Pil Jae Lee (July 16-
19 17, 2013);
- 20 • the transcript of and exhibits introduced during the deposition of Jin Kang Chung (July
21 19-20, 2013);
- 22 • the transcript of and exhibits introduced during the deposition of Duk Chul Ryu
23 (January 15-17, 2014);
- 24 • the transcript of and exhibits introduced during the deposition of Roger de Moor (July
25 31-August 1, 2012);
- 26 • the transcript of and exhibits introduced during the deposition of Pil Jae Lee (July 16-
27 17, 2013);

- 1 • the transcript of and exhibits introduced during the deposition of Jim Smith
- 2 (December 12-13, 2013);
- 3 • the transcript of and exhibits introduced during the deposition of Wiebo Vaartjes
- 4 (December 18-19, 2013);
- 5 • the transcript of and exhibits introduced during the deposition of Patrick Canavan
- 6 (January 30-31, 2014);
- 7 • the transcript of and exhibits introduced during the deposition of Robert O'Brien
- 8 (March 20-21, 2014);
- 9 • the transcript of and exhibits introduced during the deposition of Joseph Killen (May
- 10 15, 2014);
- 11 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 12 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 13 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 14 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 15 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 16 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 17 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 18 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 19 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 20 of Interrogatories (July 10, 2014); and
- 21 • Philips Electronics North America Corporation's Responses to Direct Action
- 22 Plaintiffs' First Set of Interrogatories (July 10, 2014).

23 **Request No. 8:**

24 Describe in detail and in narrative form (including by Identifying each Document, Person

25 or other evidentiary source that You rely upon) the factual basis for your allegation that

26 Chunghwa PT "dominated and/or controlled the finances, policies and affairs of Chunghwa

27 Malaysia relating to the antitrust violations alleged," as alleged in paragraph 95 of the Amended

28 Complaint.

Response to Request No. 8:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendants, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp further objects to this Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects that this Interrogatory improperly requires Sharp to marshal evidence in support of its case in response to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other discovery propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to a specific Chunghwa entity when all of the Chunghwa entities named as co-conspirators were owned and controlled and acted pursuant to the overall strategy and direction of Chunghwa Picture Tubes, Ltd. Sharp also objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this Interrogatory calls for expert testimony. Sharp also objects to the extent that this Interrogatory calls for information that is covered by attorney-client privilege or the work product protection. Sharp

1 further states that it has not completed its discovery and preparation in this matter and that its
2 investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
3 response to this Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

4 Subject to and without waiving the foregoing objections, Sharp states that the response to
5 this Interrogatory may include the transactional data and documents produced by defendants, co-
6 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
7 responsive to this Interrogatory from review of the documents and data identified in this response
8 is substantially the same for either Sharp or PENAC. Sharp further states that information
9 responsive to this Interrogatory is contained in the following, which are incorporated here by
10 reference:

- 11 • Exhibit A to these Responses;
- 12 • Attachment A to these Responses;
- 13 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
14 materials;
- 15 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
16 accompanying materials;
- 17 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 18 • the transcript of and exhibits introduced during the deposition of Chih Chun-Liu
19 (February 19-21, 2013);
- 20 • the transcript of and exhibits introduced during the deposition of Sheng-Jen Yang
21 (February 22-24, 2013); and
- 22 • the transcript of and exhibits introduced during the deposition of Jing Song Lu
23 (February 27-28, 2013).

24 **Request No. 9:**

25 Describe in detail and in narrative form (including by Identifying each Document, Person
26 or other evidentiary source that You rely upon) the factual basis for your allegation that IGC
27 “dominated and/or controlled the finances, policies and affairs of IGE relating to the antitrust
28 violations alleged,” as alleged in paragraph 98 of the Amended Complaint.

Response to Request No. 9:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendants, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp further objects to this Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects that this Interrogatory improperly requires Sharp to marshal evidence in support of its case in response to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other discovery propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to a specific Irico entity when all of the Irico entities named as co-conspirators were owned and controlled and acted pursuant to the overall strategy and direction of Irico Group Corporation. Sharp also objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this Interrogatory calls for expert testimony. Sharp also objects to the extent that this Interrogatory calls for information that is covered by attorney-client privilege or the work product protection. Sharp further states that it

1 has not completed its discovery and preparation in this matter and that its investigation of the case
2 is ongoing, and Sharp reserves its right to supplement or amend its response to this Interrogatory
3 consistent with Federal Rule of Civil Procedure 26(e).

4 Subject to and without waiving the foregoing objections, Sharp states that the response to
5 this Interrogatory may include the transactional data and documents produced by defendants, co-
6 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
7 responsive to this Interrogatory from review of the documents and data identified in this response
8 is substantially the same for either Sharp or PENAC. Sharp further states that information
9 responsive to this Interrogatory is contained in the following, which are incorporated here by
10 reference:

- 11 • Exhibit A to these Responses;
- 12 • Attachment A to these Responses;
- 13 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
14 materials;
- 15 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
16 accompanying materials; and
- 17 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15,
18 2014.

19 **Request No. 10:**

20 Describe in detail and in narrative form (including by Identifying each Document, Person
21 or other evidentiary source that You rely upon) the factual basis for your allegation that IGC
22 “dominated and/or controlled the finances, policies and affairs of IDDC relating to the antitrust
23 violations alleged,” as alleged in paragraph 99 of the Amended Complaint.

24 **Response to Request No. 10:**

25 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
26 also objects to this Interrogatory to the extent that it calls for information that is already in the
27 possession, custody, or control of Defendants, or that can equally or more readily, conveniently,
28 and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this

1 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on
2 Sharp to state its entire case on an incomplete record and review and analyze all information
3 obtained in discovery thus far at this stage of this litigation. Sharp further objects to this
4 Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects
5 that this Interrogatory improperly requires Sharp to marshal evidence in support of its case in
6 response to written discovery, but particularly while discovery is ongoing and in advance of the
7 applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects
8 to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome,
9 and oppressive, and on the grounds that it is cumulative and duplicative of other discovery
10 propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case
11 Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as
12 requiring the attribution of a particular action to a specific Irico entity when all of the Irico
13 entities named as co-conspirators were owned and controlled and acted pursuant to the overall
14 strategy and direction of Irico Group Corporation. Sharp also objects to this Interrogatory on the
15 grounds that it seeks, in contravention to well-established legal principles, to dismember the
16 overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
17 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
18 *Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
19 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
20 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
21 law, the action of all. *Id.* Sharp further objects to the extent this Interrogatory calls for expert
22 testimony. Sharp also objects to the extent that this Interrogatory calls for information that is
23 covered by attorney-client privilege or the work product protection. Sharp further states that it
24 has not completed its discovery and preparation in this matter and that its investigation of the case
25 is ongoing, and Sharp reserves its right to supplement or amend its response to this Interrogatory
26 consistent with Federal Rule of Civil Procedure 26(e).

27 Subject to and without waiving the foregoing objections, Sharp states that the response to
28 this Interrogatory may include the transactional data and documents produced by defendants, co-

1 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
2 responsive to this Interrogatory from review of the documents and data identified in this response
3 is substantially the same for either Sharp or PENAC. Sharp further states that information
4 responsive to this Interrogatory is contained in the following, which are incorporated here by
5 reference:

- 6 • Exhibit A to these Responses;
- 7 • Attachment A to these Responses;
- 8 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
9 materials;
- 10 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
11 accompanying materials; and
- 12 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014.

13 **Request No. 11:**

14 Describe in detail and in narrative form (including by Identifying each Document, Person
15 or other evidentiary source that You rely upon) the factual basis for your allegation that Orion
16 “dominated and/or controlled the finances, policies and affairs of Domex relating to the antitrust
17 violations alleged,” as alleged in paragraph 104 of the Amended Complaint.

18 **Response to Request No. 11:**

19 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
20 also objects to this Interrogatory to the extent that it calls for information that is already in the
21 possession, custody, or control of Defendants, or that can equally or more readily, conveniently,
22 and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this
23 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on
24 Sharp to state its entire case on an incomplete record and review and analyze all information
25 obtained in discovery thus far at this stage of this litigation. Sharp further objects to this
26 Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects
27 that this Interrogatory improperly requires Sharp to marshal evidence in support of its case in
28 response to written discovery, but particularly while discovery is ongoing and in advance of the

1 applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects
2 to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome,
3 and oppressive, and on the grounds that it is cumulative and duplicative of other discovery
4 propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case
5 Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as
6 requiring the attribution of a particular action to a specific Orion entity when all of the Orion
7 entities named as co-conspirators were owned and controlled and acted pursuant to the overall
8 strategy and direction of Orion Electric Company. Sharp also objects to this Interrogatory on the
9 grounds that it seeks, in contravention to well-established legal principles, to dismember the
10 overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
11 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
12 *Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
13 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
14 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
15 law, the action of all. *Id.* Sharp further objects to the extent this Interrogatory calls for expert
16 testimony. Sharp also objects to the extent that this Interrogatory calls for information that is
17 covered by attorney-client privilege or the work product protection. Sharp further states that it
18 has not completed its discovery and preparation in this matter and that its investigation of the case
19 is ongoing, and Sharp reserves its right to supplement or amend its response to this Interrogatory
20 consistent with Federal Rule of Civil Procedure 26(e).

21 Subject to and without waiving the foregoing objections, Sharp states that the response to
22 this Interrogatory may include the transactional data and documents produced by defendants, co-
23 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
24 responsive to this Interrogatory from review of the documents and data identified in this response
25 is substantially the same for either Sharp or PENAC. Sharp further states that information
26 responsive to this Interrogatory is contained in the following, which are incorporated here by
27 reference:

- 28 • Exhibit A to these Responses;

- Attachment A to these Responses;
- the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying materials;
- the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and accompanying materials; and
- Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014.

Request No. 12:

Describe in detail and in narrative form (including by Identifying each Document, Person or other evidentiary source that You rely upon) the factual basis for your allegation that Thomson SA and then Videocon and TDA “dominated and/or controlled the finances, policies and affairs of Technologies Displays Mexicana relating to the antitrust violations alleged,” as alleged in paragraph 107 of the Amended Complaint.

Response to Request No. 12:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendants, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp further objects to this Interrogatory on the grounds that it calls for legal argument or legal conclusions. Sharp objects that this Interrogatory improperly requires Sharp to marshal evidence in support of its case in response to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other discovery propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as

1 requiring the attribution of a particular action to Technologies Displays Mexicana when it was
2 owned and controlled and acted pursuant to the overall strategy and direction of Thomson SA,
3 and then Videocon and TDA. Sharp also objects to this Interrogatory on the grounds that it seeks,
4 in contravention to well-established legal principles, to dismember the overall conspiracy to focus
5 on its separate parts, instead of looking at it as a whole. *See Continental Ore Co. v. Union*
6 *Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans.*
7 *Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544
8 (1913)). All conspirators are jointly liable for the acts of their co-conspirators and the action of
9 any of the conspirators in furtherance of the conspiracy is, in law, the action of all. *Id.* Sharp
10 further objects to the extent this Interrogatory calls for expert testimony. Sharp also objects to the
11 extent that this Interrogatory calls for information that is covered by attorney-client privilege or
12 the work product protection. Sharp further states that it has not completed its discovery and
13 preparation in this matter and that its investigation of the case is ongoing, and Sharp reserves its
14 right to supplement or amend its response to this Interrogatory consistent with Federal Rule of
15 Civil Procedure 26(e).

16 Subject to and without waiving the foregoing objections, Sharp states that the response to
17 this Interrogatory may include the transactional data and documents produced by defendants, co-
18 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
19 responsive to this Interrogatory from review of the documents and data identified in this response
20 is substantially the same for either Sharp or PENAC. Sharp further states that information
21 responsive to this Interrogatory is contained in the following, which are incorporated here by
22 reference:

- 23 • Exhibit A to these Responses;
- 24 • Attachment A to these Responses;
- 25 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
26 materials;
- 27 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
28 accompanying materials;

- Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- Statement of Albino Bessa Re Technologies Displays Americas, LLC (April 18, 2014);
- Technologies Displays Americas LLC's Responses to Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.'s First Set of Interrogatories (October 8, 2013);
- Answer of Thomson Consumer Electronics, Inc. to Sharp's First Amended Complaint (April 25, 2014);
- Answer of Thomson SA to Sharp's First Amended Complaint (April 25, 2014);
- Answer of Technologies Displays Americas, LLC to First Amended Complaint of Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc. (May 23, 2014); and
- Sharp's Objections and Responses to Thomson SA and Thomson Consumer's First Set of Interrogatories (July 10, 2014).

Request No. 13:

Separately Identify each meeting or communication with a competitor or competitors in which you contend Chunghwa PT or Chunghwa Malaysia participated in between 1995 and 2007.

Response to Request No. 13:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendant, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory improperly requires Sharp to marshal evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects

1 to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome,
2 and oppressive, and on the grounds that it is cumulative and duplicative of other discovery
3 propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case
4 Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as
5 requiring the attribution of a particular action to a specific Chunghwa entity when all of the
6 Chunghwa entities named as co-conspirators were owned and controlled and acted pursuant to the
7 overall strategy and direction of Chunghwa Picture Tubes, Ltd. Sharp also objects to this
8 Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to
9 dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a
10 whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962);
11 *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980)
12 (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for
13 the acts of their co-conspirators and the action of any of the conspirators in furtherance of the
14 conspiracy is, in law, the action of all. *Id.* Moreover, the documentary record is necessarily
15 incomplete because Defendants and co-conspirators concealed the conspiracy by various means
16 and methods, including concealing the existence and nature of their conspiratorial activities and
17 issuing regular instructions to destroy documents relating to the conspiratorial activities. Sharp
18 further objects to the extent this request calls for expert testimony. Sharp also objects to the
19 extent that this request calls for information that is covered by attorney-client privilege or the
20 work product protection. Sharp further states that it has not completed its discovery and
21 preparation in this matter and that its investigation of the case is ongoing, and Sharp reserves its
22 right to supplement or amend its response to this Interrogatory consistent with Federal Rule of
23 Civil Procedure 26(e).

24 Subject to and without waiving the foregoing objections, Sharp states that the response to
25 this Interrogatory may include the transactional data and documents produced by defendants, co-
26 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
27 responsive to this Interrogatory from review of the documents and data identified in this response
28 is substantially the same for either Sharp or PENAC. Sharp further states that information

responsive to this Interrogatory is contained in the following, which are incorporated here by reference:

- Exhibit A to these Responses;
- Attachment A to these Responses;
- the transcript of and exhibits introduced during the deposition of Chih Chun-Liu (February 19-21, 2013);
- the transcript of and exhibits introduced during the deposition of Sheng-Jen Yang (February 22-24, 2013);
- the transcript of and exhibits introduced during the deposition of Jing Song Lu (February 27-28, 2013);
- the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying materials;
- the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying materials;
- the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and accompanying materials;
- Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- Korean Fair Trade Commission Report on the CRT Conspiracy;
- The European Commission Report on the CRT Conspiracy;
- Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, No. 5 (February 10, 2012);
- Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12, 2013);
- Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);

- 1 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
2 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 3 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
4 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
5 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 6 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
7 of Interrogatories (July 10, 2014);
- 8 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
9 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 10 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
11 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 12 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
13 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
14 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
15 Interrogatories (November 2, 2011);
- 16 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
17 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
18 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
19 Interrogatories (December 23, 2011);
- 20 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
21 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 22 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
23 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 24 • Philips Electronics North America Corporation's Responses to Direct Action
25 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 26 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
27 Interrogatories (May 12, 2010);
- 28

- 1 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
2 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 3 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
4 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 5 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
6 (November 25, 2013);
- 7 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
8 Admission (November 25, 2013);
- 9 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
10 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
11 Interrogatories (February 10, 2012);
- 12 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
13 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 14 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
15 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 16 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
17 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
18 those Responses (July 28, 2014);
- 19 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
20 Interrogatories to Sharp (August 4, 2014);
- 21 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
22 2014);
- 23 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
24 Interrogatories to Sharp (August 4, 2014);
- 25 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
26 4, 2014);
- 27 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
28 (August 4, 2014);

- 1 • Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp
- 2 (August 21, 2014);
- 3 • Sharp's Response to Panasonic Corporation of North America's First Set of
- 4 Interrogatories to Sharp (August 21, 2014); and
- 5 • Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp
- 6 (August 25, 2014).

7 **Request No. 14:**

8 Separately Identify each meeting or communication with a competitor or competitors in
9 which you contend Orion, Orion Engineering, or Domex participated in between 1995 and 2007.

10 **Response to Request No. 14:**

11 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
12 also objects to this Interrogatory to the extent that it calls for information that is already in the
13 possession, custody, or control of Defendant, or that can equally or more readily, conveniently,
14 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this
15 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on
16 Sharp to state its entire case on an incomplete record and review and analyze all information
17 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory
18 improperly requires Sharp to marshal evidence in support of its case, including all testimony, in
19 responses to written discovery, but particularly while discovery is ongoing and in advance of the
20 applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects
21 to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome,
22 and oppressive, and on the grounds that it is cumulative and duplicative of other discovery
23 propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case
24 Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as
25 requiring the attribution of a particular action to a specific Orion entity when all of the Orion
26 entities named as co-conspirators were owned and controlled and acted pursuant to the overall
27 strategy and direction of Orion Electric Co. Sharp also objects to this Interrogatory on the
28 grounds that it seeks, in contravention to well-established legal principles, to dismember the

1 overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
2 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
3 *Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
4 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
5 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
6 law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because
7 Defendants and co-conspirators concealed the conspiracy by various means and methods,
8 including concealing the existence and nature of their conspiratorial activities and issuing regular
9 instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to
10 the extent this request calls for expert testimony. Sharp also objects to the extent that this request
11 calls for information that is covered by attorney-client privilege or the work product protection.
12 Sharp further states that it has not completed its discovery and preparation in this matter and that
13 its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
14 response to this Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

15 Subject to and without waiving the foregoing objections, Sharp states that the response to
16 this Interrogatory may include the transactional data and documents produced by defendants, co-
17 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
18 responsive to this Interrogatory from review of the documents and data identified in this response
19 is substantially the same for either Sharp or PENAC. Sharp further states that information
20 responsive to this Interrogatory is contained in the following, which are incorporated here by
21 reference:

- 22 • Exhibit A to these Responses;
- 23 • Attachment A to these Responses;
- 24 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
25 materials;
- 26 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
27 materials;

- 1 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
- 2 accompanying materials;
- 3 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 4 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 5 • The European Commission Report on the CRT Conspiracy;
- 6 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
- 7 Set of Interrogatories, No. 5 (February 10, 2012);
- 8 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
- 9 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
- 10 2013);
- 11 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 12 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 13 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 14 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 15 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 16 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 17 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 18 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 19 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 20 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 21 of Interrogatories (July 10, 2014);
- 22 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 23 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 24 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 25 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 26 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 27 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 28

1 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
2 Interrogatories (November 2, 2011);

- 3 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
4 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
5 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
6 Interrogatories (December 23, 2011);
- 7 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
8 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 9 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
10 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 11 • Philips Electronics North America Corporation's Responses to Direct Action
12 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 13 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
14 Interrogatories (May 12, 2010);
- 15 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
16 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 17 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
18 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 19 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
20 (November 25, 2013);
- 21 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
22 Admission (November 25, 2013);
- 23 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
24 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
25 Interrogatories (February 10, 2012);
- 26 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
27 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
28

- Sharp's Responses to Thomson SA and Thomson Consumer's First Set of Interrogatories, Nos. 2 & 8 (July 10, 2014);
- Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to those Responses (July 28, 2014);
- Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp (August 21, 2014);
- Sharp's Response to Panasonic Corporation of North America's First Set of Interrogatories to Sharp (August 21, 2014); and
- Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp (August 25, 2014).

Request No. 15:

Separately Identify each meeting or communication with a competitor or competitors in which you contend IGC, IGE, or IDDC participated in between 1995 and 2007.

Response to Request No. 15:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendant, or that can equally or more readily, conveniently,

1 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this
2 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on
3 Sharp to state its entire case on an incomplete record and review and analyze all information
4 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory
5 improperly requires Sharp to marshal evidence in support of its case, including all testimony, in
6 responses to written discovery, but particularly while discovery is ongoing and in advance of the
7 applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects
8 to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome,
9 and oppressive, and on the grounds that it is cumulative and duplicative of other discovery
10 propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case
11 Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as
12 requiring the attribution of a particular action to a specific Irico entity when all of the Irico
13 entities named as co-conspirators were owned and controlled and acted pursuant to the overall
14 strategy and direction of Irico Group Corporation. Sharp also objects to this Interrogatory on the
15 grounds that it seeks, in contravention to well-established legal principles, to dismember the
16 overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
17 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
18 *Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
19 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
20 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
21 law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because
22 Defendants and co-conspirators concealed the conspiracy by various means and methods,
23 including concealing the existence and nature of their conspiratorial activities and issuing regular
24 instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to
25 the extent this request calls for expert testimony. Sharp also objects to the extent that this request
26 calls for information that is covered by attorney-client privilege or the work product protection.
27 Sharp further states that it has not completed its discovery and preparation in this matter and that
28

1 its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
2 response to this Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

3 Subject to and without waiving the foregoing objections, Sharp states that the response to
4 this Interrogatory may include the transactional data and documents produced by defendants, co-
5 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
6 responsive to this Interrogatory from review of the documents and data identified in this response
7 is substantially the same for either Sharp or PENAC. Sharp further states that information
8 responsive to this Interrogatory is contained in the following, which are incorporated here by
9 reference:

- 10 • Exhibit A to these Responses;
- 11 • Attachment A to these Responses;
- 12 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
13 materials;
- 14 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
15 materials;
- 16 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
17 accompanying materials;
- 18 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 19 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 20 • The European Commission Report on the CRT Conspiracy;
- 21 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
22 Set of Interrogatories, No. 5 (February 10, 2012);
- 23 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
24 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
25 2013);
- 26 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
27 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 28

- 1 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
2 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 3 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
4 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 5 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
6 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
7 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 8 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
9 of Interrogatories (July 10, 2014);
- 10 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
11 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 12 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
13 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 14 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
15 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
16 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
17 Interrogatories (November 2, 2011);
- 18 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
19 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
20 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
21 Interrogatories (December 23, 2011);
- 22 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
23 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 24 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
25 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 26 • Philips Electronics North America Corporation's Responses to Direct Action
27 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 28

- 1 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 2 Interrogatories (May 12, 2010);
- 3 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 4 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 5 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 6 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 7 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 8 (November 25, 2013);
- 9 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 10 Admission (November 25, 2013);
- 11 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 12 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 13 Interrogatories (February 10, 2012);
- 14 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 15 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 16 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 17 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 18 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 19 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 20 those Responses (July 28, 2014);
- 21 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 22 Interrogatories to Sharp (August 4, 2014);
- 23 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 24 2014);
- 25 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 26 Interrogatories to Sharp (August 4, 2014);
- 27 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 28 4, 2014);

- 1 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 2 (August 4, 2014);
- 3 • Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp
- 4 (August 21, 2014);
- 5 • Sharp's Response to Panasonic Corporation of North America's First Set of
- 6 Interrogatories to Sharp (August 21, 2014); and
- 7 • Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp
- 8 (August 25, 2014).

9 **Request No. 16:**

10 Separately Identify each meeting or communication with a competitor or competitors in
11 which you contend LG Electronics Taiwan participated in between 1995 and 2007.

12 **Response to Request No. 16:**

13 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
14 also objects to this Interrogatory to the extent that it calls for information that is already in the
15 possession, custody, or control of Defendant, or that can equally or more readily, conveniently,
16 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this
17 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on
18 Sharp to state its entire case on an incomplete record and review and analyze all information
19 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory
20 improperly requires Sharp to marshal evidence in support of its case, including all testimony, in
21 responses to written discovery, but particularly while discovery is ongoing and in advance of the
22 applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects
23 to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome,
24 and oppressive, and on the grounds that it is cumulative and duplicative of other discovery
25 propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case
26 Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as
27 requiring the attribution of a particular action to a specific LG entity when all of the LG entities
28 named as co-conspirators were owned and controlled and acted pursuant to the overall strategy

1 and direction of LG Electronics, Inc. Sharp also objects to this Interrogatory on the grounds that
2 it seeks, in contravention to well-established legal principles, to dismember the overall conspiracy
3 to focus on its separate parts, instead of looking at it as a whole. *See Continental Ore Co. v.*
4 *Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int'l Air*
5 *Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S.
6 525, 544 (1913)). All conspirators are jointly liable for the acts of their co-conspirators and the
7 action of any of the conspirators in furtherance of the conspiracy is, in law, the action of all. *Id.*
8 Moreover, the documentary record is necessarily incomplete because Defendants and co-
9 conspirators concealed the conspiracy by various means and methods, including concealing the
10 existence and nature of their conspiratorial activities and issuing regular instructions to destroy
11 documents relating to the conspiratorial activities. Sharp further objects to the extent this request
12 calls for expert testimony. Sharp also objects to the extent that this request calls for information
13 that is covered by attorney-client privilege or the work product protection. Sharp further states
14 that it has not completed its discovery and preparation in this matter and that its investigation of
15 the case is ongoing, and Sharp reserves its right to supplement or amend its response to this
16 Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

17 Subject to and without waiving the foregoing objections, Sharp states that the response to
18 this Interrogatory may include the transactional data and documents produced by defendants, co-
19 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
20 responsive to this Interrogatory from review of the documents and data identified in this response
21 is substantially the same for either Sharp or PENAC. Sharp further states that information
22 responsive to this Interrogatory is contained in the following, which are incorporated here by
23 reference:

- 24 • Exhibit A to these Responses;
- 25 • Attachment A to these Responses;
- 26 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
27 materials;

- 1 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
- 2 materials;
- 3 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
- 4 accompanying materials;
- 5 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 6 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 7 • The European Commission Report on the CRT Conspiracy;
- 8 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
- 9 Set of Interrogatories, No. 5 (February 10, 2012);
- 10 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
- 11 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
- 12 2013);
- 13 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 14 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 15 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 16 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 17 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 18 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 19 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 20 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 21 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 22 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 23 of Interrogatories (July 10, 2014);
- 24 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 25 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 26 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 27 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 28

- 1 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 2 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 3 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 4 Interrogatories (November 2, 2011);
- 5 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 6 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
- 7 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 8 Interrogatories (December 23, 2011);
- 9 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 10 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 11 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 12 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 13 • Philips Electronics North America Corporation's Responses to Direct Action
- 14 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 15 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 16 Interrogatories (May 12, 2010);
- 17 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 18 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 19 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 20 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 21 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 22 (November 25, 2013);
- 23 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 24 Admission (November 25, 2013);
- 25 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 26 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 27 Interrogatories (February 10, 2012);
- 28

- Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- Sharp's Responses to Thomson SA and Thomson Consumer's First Set of Interrogatories, Nos. 2 & 8 (July 10, 2014);
- Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to those Responses (July 28, 2014);
- Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp (August 21, 2014);
- Sharp's Response to Panasonic Corporation of North America's First Set of Interrogatories to Sharp (August 21, 2014); and
- Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp (August 25, 2014).

Request No. 17:

Separately Identify each meeting or communication with a competitor or competitors in which you contend LG.Philips Displays, LG.Philips Shuguang, LG.Philips Singapore, and PT.LP Indonesia participated in between 1995 and 2007.

Response to Request No. 17:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendant, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory improperly requires Sharp to marshal evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other discovery propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to a specific LPD entity when all of the LPD entities named as co-conspirators were owned and controlled and acted pursuant to the overall strategy and direction of LG.Philips Displays. Sharp also objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because Defendants and co-conspirators concealed the conspiracy by various means and methods, including concealing the existence and nature of their conspiratorial activities and issuing regular instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to

1 the extent this request calls for expert testimony. Sharp also objects to the extent that this request
2 calls for information that is covered by attorney-client privilege or the work product protection.
3 Sharp further states that it has not completed its discovery and preparation in this matter and that
4 its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
5 response to this Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

6 Subject to and without waiving the foregoing objections, Sharp states that the response to
7 this Interrogatory may include the transactional data and documents produced by defendants, co-
8 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
9 responsive to this Interrogatory from review of the documents and data identified in this response
10 is substantially the same for either Sharp or PENAC. Sharp further states that information
11 responsive to this Interrogatory is contained in the following, which are incorporated here by
12 reference:

- 13 • Exhibit A to these Responses;
- 14 • Attachment A to these Responses;
- 15 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
16 materials;
- 17 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
18 materials;
- 19 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
20 accompanying materials;
- 21 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 22 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 23 • The European Commission Report on the CRT Conspiracy;
- 24 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
25 Set of Interrogatories, No. 5 (February 10, 2012);
- 26 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
27 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
28 2013);

- 1 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 2 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 3 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 4 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 5 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 6 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 7 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 8 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 9 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 10 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 11 of Interrogatories (July 10, 2014);
- 12 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 13 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 14 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 15 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 16 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 17 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 18 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 19 Interrogatories (November 2, 2011);
- 20 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 21 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
- 22 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 23 Interrogatories (December 23, 2011);
- 24 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 25 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 26 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 27 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 28

- 1 • Philips Electronics North America Corporation's Responses to Direct Action
2 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 3 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
4 Interrogatories (May 12, 2010);
- 5 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
6 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 7 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
8 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 9 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
10 (November 25, 2013);
- 11 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
12 Admission (November 25, 2013);
- 13 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
14 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
15 Interrogatories (February 10, 2012);
- 16 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
17 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 18 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
19 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 20 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
21 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
22 those Responses (July 28, 2014);
- 23 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
24 Interrogatories to Sharp (August 4, 2014);
- 25 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
26 2014);
- 27 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
28 Interrogatories to Sharp (August 4, 2014);

- 1 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 2 4, 2014);
- 3 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 4 (August 4, 2014);
- 5 • Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp
- 6 (August 21, 2014);
- 7 • Sharp's Response to Panasonic Corporation of North America's First Set of
- 8 Interrogatories to Sharp (August 21, 2014); and
- 9 • Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp
- 10 (August 25, 2014).

Request No. 18:

12 Separately Identify each meeting or communication with a competitor or competitors in
13 which you contend Mitsubishi Electric Japan, Mitsubishi Electric USA, Mitsubishi Digital
14 participated in between 1995 and 2007.

Response to Request No. 18:

16 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
17 objects to this Interrogatory on the grounds that it is unintelligible, vague, and ambiguous because
18 it Sharp does not make any specific allegations against Mitsubishi Electric Japan, Mitsubishi
19 Electric USA, or Mitsubishi Digital in the Complaint. Sharp also objects to this Interrogatory to
20 the extent that it calls for information that is already in the possession, custody, or control of
21 Defendant, or that can equally or more readily, conveniently, and in a less burdensome fashion be
22 obtained by Defendant. Sharp further objects to this Interrogatory on the grounds that it is
23 premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an
24 incomplete record and review and analyze all information obtained in discovery thus far at this
25 stage of this litigation. Sharp objects that this Interrogatory improperly requires Sharp to marshal
26 evidence in support of its case, including all testimony, in responses to written discovery, but
27 particularly while discovery is ongoing and in advance of the applicable deadlines set by the
28 Court for disclosure of pretrial information. Sharp further objects to the Interrogatory on the

1 grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on
2 the grounds that it is cumulative and duplicative of other discovery propounded in this case, and
3 is therefore in violation of the Order Regarding Discovery and Case Management Protocol (MDL
4 Dkt. No. 1128). Sharp also objects to this Interrogatory on the grounds that it seeks, in
5 contravention to well-established legal principles, to dismember the overall conspiracy to focus
6 on its separate parts, instead of looking at it as a whole. *See Continental Ore Co. v. Union*
7 *Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans.*
8 *Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544
9 (1913)). All conspirators are jointly liable for the acts of their co-conspirators and the action of
10 any of the conspirators in furtherance of the conspiracy is, in law, the action of all. *Id.* Moreover,
11 the documentary record is necessarily incomplete because Defendants and co-conspirators
12 concealed the conspiracy by various means and methods, including concealing the existence and
13 nature of their conspiratorial activities and issuing regular instructions to destroy documents
14 relating to the conspiratorial activities. Sharp further objects to the extent this request calls for
15 expert testimony. Sharp also objects to the extent that this request calls for information that is
16 covered by attorney-client privilege or the work product protection. Sharp further states that it
17 has not completed its discovery and preparation in this matter and that its investigation of the case
18 is ongoing, and Sharp reserves its right to supplement or amend its response to this Interrogatory
19 consistent with Federal Rule of Civil Procedure 26(e).

20 **Request No. 19:**

21 Separately Identify each meeting or communication with a competitor or competitors in
22 which you contend MTPD America participated in between 1995 and 2007.

23 **Response to Request No. 19:**

24 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
25 also objects to this Interrogatory to the extent that it calls for information that is already in the
26 possession, custody, or control of Defendant, or that can equally or more readily, conveniently,
27 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this
28 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on

1 Sharp to state its entire case on an incomplete record and review and analyze all information
2 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory
3 improperly requires Sharp to marshal evidence in support of its case, including all testimony, in
4 responses to written discovery, but particularly while discovery is ongoing and in advance of the
5 applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects
6 to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome,
7 and oppressive, and on the grounds that it is cumulative and duplicative of other discovery
8 propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case
9 Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as
10 requiring the attribution of a particular action to a specific Panasonic entity when all of the
11 Panasonic entities named as co-conspirators were owned and controlled and acted pursuant to the
12 overall strategy and direction of Panasonic Corporation. Sharp also objects to this Interrogatory
13 on the grounds that it seeks, in contravention to well-established legal principles, to dismember
14 the overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
15 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
16 *Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
17 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
18 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
19 law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because
20 Defendants and co-conspirators concealed the conspiracy by various means and methods,
21 including concealing the existence and nature of their conspiratorial activities and issuing regular
22 instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to
23 the extent this request calls for expert testimony. Sharp also objects to the extent that this request
24 calls for information that is covered by attorney-client privilege or the work product protection.
25 Sharp further states that it has not completed its discovery and preparation in this matter and that
26 its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
27 response to this Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

1 Subject to and without waiving the foregoing objections, Sharp states that the response to
2 this Interrogatory may include the transactional data and documents produced by defendants, co-
3 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
4 responsive to this Interrogatory from review of the documents and data identified in this response
5 is substantially the same for either Sharp or PENAC. Sharp further states that information
6 responsive to this Interrogatory is contained in the following, which are incorporated here by
7 reference:

- 8 • Exhibit A to these Responses;
- 9 • Attachment A to these Responses;
- 10 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
11 materials;
- 12 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
13 materials;
- 14 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
15 accompanying materials;
- 16 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 17 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 18 • The European Commission Report on the CRT Conspiracy;
- 19 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
20 Set of Interrogatories, No. 5 (February 10, 2012);
- 21 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
22 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
23 2013);
- 24 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
25 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 26 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
27 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 28

- 1 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
2 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 3 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
4 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
5 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 6 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
7 of Interrogatories (July 10, 2014);
- 8 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
9 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 10 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
11 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 12 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
13 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
14 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
15 Interrogatories (November 2, 2011);
- 16 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
17 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
18 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
19 Interrogatories (December 23, 2011);
- 20 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
21 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 22 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
23 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 24 • Philips Electronics North America Corporation's Responses to Direct Action
25 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 26 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
27 Interrogatories (May 12, 2010);
- 28

- 1 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
2 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 3 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
4 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 5 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
6 (November 25, 2013);
- 7 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
8 Admission (November 25, 2013);
- 9 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
10 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
11 Interrogatories (February 10, 2012);
- 12 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
13 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 14 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
15 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 16 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
17 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
18 those Responses (July 28, 2014);
- 19 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
20 Interrogatories to Sharp (August 4, 2014);
- 21 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
22 2014);
- 23 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
24 Interrogatories to Sharp (August 4, 2014);
- 25 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
26 4, 2014);
- 27 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
28 (August 4, 2014);

- 1 • Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp
- 2 (August 21, 2014);
- 3 • Sharp's Response to Panasonic Corporation of North America's First Set of
- 4 Interrogatories to Sharp (August 21, 2014); and
- 5 • Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp
- 6 (August 25, 2014).

7 **Request No. 20:**

8 Separately Identify each meeting or communication with a competitor or competitors in
9 which you contend Samsung Elektronische Bauelemente participated in between 1995 and 2007.

10 **Response to Request No. 20:**

11 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
12 also objects to this Interrogatory to the extent that it calls for information that is already in the
13 possession, custody, or control of Defendant, or that can equally or more readily, conveniently,
14 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this
15 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on
16 Sharp to state its entire case on an incomplete record and review and analyze all information
17 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory
18 improperly requires Sharp to marshal evidence in support of its case, including all testimony, in
19 responses to written discovery, but particularly while discovery is ongoing and in advance of the
20 applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects
21 to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome,
22 and oppressive, and on the grounds that it is cumulative and duplicative of other discovery
23 propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case
24 Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as
25 requiring the attribution of a particular action to a specific Samsung entity when all of the
26 Samsung entities named as co-conspirators were owned and controlled and acted pursuant to the
27 overall strategy and direction of Samsung SDI Co., Ltd. Sharp also objects to this Interrogatory
28 on the grounds that it seeks, in contravention to well-established legal principles, to dismember

1 the overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
2 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
3 *Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
4 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
5 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
6 law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because
7 Defendants and co-conspirators concealed the conspiracy by various means and methods,
8 including concealing the existence and nature of their conspiratorial activities and issuing regular
9 instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to
10 the extent this request calls for expert testimony. Sharp also objects to the extent that this request
11 calls for information that is covered by attorney-client privilege or the work product protection.
12 Sharp further states that it has not completed its discovery and preparation in this matter and that
13 its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
14 response to this Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

15 Subject to and without waiving the foregoing objections, Sharp states that the response to
16 this Interrogatory may include the transactional data and documents produced by defendants, co-
17 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
18 responsive to this Interrogatory from review of the documents and data identified in this response
19 is substantially the same for either Sharp or PENAC. Sharp further states that information
20 responsive to this Interrogatory is contained in the following, which are incorporated here by
21 reference:

- 22 • Exhibit A to these Responses;
- 23 • Attachment A to these Responses;
- 24 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
25 materials;
- 26 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
27 materials;

- 1 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
- 2 accompanying materials;
- 3 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 4 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 5 • The European Commission Report on the CRT Conspiracy;
- 6 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
- 7 Set of Interrogatories, No. 5 (February 10, 2012);
- 8 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
- 9 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
- 10 2013);
- 11 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 12 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 13 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 14 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 15 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 16 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 17 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 18 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 19 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 20 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 21 of Interrogatories (July 10, 2014);
- 22 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 23 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 24 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 25 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 26 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 27 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 28

1 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
2 Interrogatories (November 2, 2011);

- 3 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
4 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
5 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
6 Interrogatories (December 23, 2011);
- 7 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
8 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 9 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
10 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 11 • Philips Electronics North America Corporation's Responses to Direct Action
12 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 13 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
14 Interrogatories (May 12, 2010);
- 15 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
16 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 17 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
18 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 19 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
20 (November 25, 2013);
- 21 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
22 Admission (November 25, 2013);
- 23 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
24 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
25 Interrogatories (February 10, 2012);
- 26 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
27 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
28

- Sharp's Responses to Thomson SA and Thomson Consumer's First Set of Interrogatories, Nos. 2 & 8 (July 10, 2014);
- Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to those Responses (July 28, 2014);
- Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp (August 21, 2014);
- Sharp's Response to Panasonic Corporation of North America's First Set of Interrogatories to Sharp (August 21, 2014); and
- Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp (August 25, 2014).

Request No. 21:

Separately Identify each meeting or communication with a competitor or competitors in which you contend Samtel participated in between 1995 and 2007.

Response to Request No. 21:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendant, or that can equally or more readily, conveniently,

1 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this
2 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on
3 Sharp to state its entire case on an incomplete record and review and analyze all information
4 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory
5 improperly requires Sharp to marshal evidence in support of its case, including all testimony, in
6 responses to written discovery, but particularly while discovery is ongoing and in advance of the
7 applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects
8 to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome,
9 and oppressive, and on the grounds that it is cumulative and duplicative of other discovery
10 propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case
11 Management Protocol (MDL Dkt. No. 1128). Sharp also objects to this Interrogatory on the
12 grounds that it seeks, in contravention to well-established legal principles, to dismember the
13 overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
14 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
15 *Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
16 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
17 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
18 law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because
19 Defendants and co-conspirators concealed the conspiracy by various means and methods,
20 including concealing the existence and nature of their conspiratorial activities and issuing regular
21 instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to
22 the extent this request calls for expert testimony. Sharp also objects to the extent that this request
23 calls for information that is covered by attorney-client privilege or the work product protection.
24 Sharp further states that it has not completed its discovery and preparation in this matter and that
25 its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
26 response to this Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

27 Subject to and without waiving the foregoing objections, Sharp states that the response to
28 this Interrogatory may include the transactional data and documents produced by defendants, co-

1 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
2 responsive to this Interrogatory from review of the documents and data identified in this response
3 is substantially the same for either Sharp or PENAC. Sharp further states that information
4 responsive to this Interrogatory is contained in the following, which are incorporated here by
5 reference:

- 6 • Exhibit A to these Responses;
- 7 • Attachment A to these Responses;
- 8 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
9 materials;
- 10 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
11 materials;
- 12 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
13 accompanying materials;
- 14 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 15 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 16 • The European Commission Report on the CRT Conspiracy;
- 17 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
18 Set of Interrogatories, No. 5 (February 10, 2012);
- 19 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
20 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
21 2013);
- 22 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
23 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 24 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
25 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 26 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
27 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 28

- 1 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
2 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
3 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 4 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
5 of Interrogatories (July 10, 2014);
- 6 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
7 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 8 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
9 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 10 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
11 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
12 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
13 Interrogatories (November 2, 2011);
- 14 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
15 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
16 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
17 Interrogatories (December 23, 2011);
- 18 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
19 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 20 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
21 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 22 • Philips Electronics North America Corporation's Responses to Direct Action
23 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 24 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
25 Interrogatories (May 12, 2010);
- 26 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
27 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 28

- 1 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
2 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 3 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
4 (November 25, 2013);
- 5 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
6 Admission (November 25, 2013);
- 7 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
8 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
9 Interrogatories (February 10, 2012);
- 10 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
11 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 12 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
13 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 14 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
15 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
16 those Responses (July 28, 2014);
- 17 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
18 Interrogatories to Sharp (August 4, 2014);
- 19 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
20 2014);
- 21 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
22 Interrogatories to Sharp (August 4, 2014);
- 23 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
24 4, 2014);
- 25 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
26 (August 4, 2014);
- 27 • Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp
28 (August 21, 2014);

- Sharp's Response to Panasonic Corporation of North America's First Set of Interrogatories to Sharp (August 21, 2014); and
- Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp (August 25, 2014).

Request No. 22:

Separately Identify each meeting or communication with a competitor or competitors in which you contend Technologies Displays Mexicana participated in between 1995 and 2007.

Response to Request No. 22:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendant, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory improperly requires Sharp to marshal evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other discovery propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case Management Protocol (MDL Dkt. No. 1128). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to Technologies Displays Mexicana when it was owned and controlled and acted pursuant to the overall strategy and direction of Thomson SA, and then Videocon and TDA. Sharp also objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans.*

1 *Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544
2 (1913)). All conspirators are jointly liable for the acts of their co-conspirators and the action of
3 any of the conspirators in furtherance of the conspiracy is, in law, the action of all. *Id.* Moreover,
4 the documentary record is necessarily incomplete because Defendants and co-conspirators
5 concealed the conspiracy by various means and methods, including concealing the existence and
6 nature of their conspiratorial activities and issuing regular instructions to destroy documents
7 relating to the conspiratorial activities. Sharp further objects to the extent this request calls for
8 expert testimony. Sharp also objects to the extent that this request calls for information that is
9 covered by attorney-client privilege or the work product protection. Sharp further states that it
10 has not completed its discovery and preparation in this matter and that its investigation of the case
11 is ongoing, and Sharp reserves its right to supplement or amend its response to this Interrogatory
12 consistent with Federal Rule of Civil Procedure 26(e).

13 Subject to and without waiving the foregoing objections, Sharp states that the response to
14 this Interrogatory may include the transactional data and documents produced by defendants, co-
15 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
16 responsive to this Interrogatory from review of the documents and data identified in this response
17 is substantially the same for either Sharp or PENAC. Sharp further states that information
18 responsive to this Interrogatory is contained in the following, which are incorporated here by
19 reference:

- 20 • Exhibit A to these Responses;
- 21 • Attachment A to these Responses;
- 22 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
23 materials;
- 24 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
25 materials;
- 26 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
27 accompanying materials;
- 28 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;

- 1 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 2 • The European Commission Report on the CRT Conspiracy;
- 3 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
- 4 Set of Interrogatories, No. 5 (February 10, 2012);
- 5 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
- 6 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
- 7 2013);
- 8 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 9 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 10 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 11 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 12 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 13 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 14 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 15 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 16 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 17 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 18 of Interrogatories (July 10, 2014);
- 19 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 20 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 21 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 22 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 23 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 24 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 25 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 26 Interrogatories (November 2, 2011);
- 27 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 28 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third

1 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
2 Interrogatories (December 23, 2011);

- 3 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
4 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 5 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
6 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 7 • Philips Electronics North America Corporation's Responses to Direct Action
8 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 9 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
10 Interrogatories (May 12, 2010);
- 11 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
12 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 13 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
14 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 15 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
16 (November 25, 2013);
- 17 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
18 Admission (November 25, 2013);
- 19 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
20 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
21 Interrogatories (February 10, 2012);
- 22 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
23 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 24 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
25 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 26 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
27 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
28 those Responses (July 28, 2014);

- Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp (August 21, 2014);
- Sharp's Response to Panasonic Corporation of North America's First Set of Interrogatories to Sharp (August 21, 2014); and
- Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp (August 25, 2014).

Request No. 23:

Separately Identify each meeting or communication with a competitor or competitors in which you contend Thai CRT participated in between 1995 and 2007.

Response to Request No. 23:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendant, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory improperly requires Sharp to marshal evidence in support of its case, including all testimony, in

1 responses to written discovery, but particularly while discovery is ongoing and in advance of the
2 applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects
3 to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome,
4 and oppressive, and on the grounds that it is cumulative and duplicative of other discovery
5 propounded in this case, and is therefore in violation of the Order Regarding Discovery and Case
6 Management Protocol (MDL Dkt. No. 1128). Sharp also objects to this Interrogatory on the
7 grounds that it seeks, in contravention to well-established legal principles, to dismember the
8 overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See*
9 *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel*
10 *Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United*
11 *States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their
12 co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in
13 law, the action of all. *Id.* Moreover, the documentary record is necessarily incomplete because
14 Defendants and co-conspirators concealed the conspiracy by various means and methods,
15 including concealing the existence and nature of their conspiratorial activities and issuing regular
16 instructions to destroy documents relating to the conspiratorial activities. Sharp further objects to
17 the extent this request calls for expert testimony. Sharp also objects to the extent that this request
18 calls for information that is covered by attorney-client privilege or the work product protection.
19 Sharp further states that it has not completed its discovery and preparation in this matter and that
20 its investigation of the case is ongoing, and Sharp reserves its right to supplement or amend its
21 response to this Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

22 Subject to and without waiving the foregoing objections, Sharp states that the response to
23 this Interrogatory may include the transactional data and documents produced by defendants, co-
24 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
25 responsive to this Interrogatory from review of the documents and data identified in this response
26 is substantially the same for either Sharp or PENAC. Sharp further states that information
27 responsive to this Interrogatory is contained in the following, which are incorporated here by
28 reference:

- 1 • Exhibit A to these Responses;
- 2 • Attachment A to these Responses;
- 3 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
- 4 materials;
- 5 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
- 6 materials;
- 7 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
- 8 accompanying materials;
- 9 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 10 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 11 • The European Commission Report on the CRT Conspiracy;
- 12 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
- 13 Set of Interrogatories, No. 5 (February 10, 2012);
- 14 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
- 15 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
- 16 2013);
- 17 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 18 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 19 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 20 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 21 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 22 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 23 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 24 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 25 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 26 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 27 of Interrogatories (July 10, 2014);
- 28

- 1 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 2 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 3 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 4 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 5 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 6 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 7 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 8 Interrogatories (November 2, 2011);
- 9 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 10 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
- 11 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 12 Interrogatories (December 23, 2011);
- 13 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 14 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 15 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 16 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 17 • Philips Electronics North America Corporation's Responses to Direct Action
- 18 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 19 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 20 Interrogatories (May 12, 2010);
- 21 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 22 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 23 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 24 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 25 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 26 (November 25, 2013);
- 27 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 28 Admission (November 25, 2013);

- 1 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 2 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 3 Interrogatories (February 10, 2012);
- 4 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 5 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 6 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 7 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 8 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 9 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 10 those Responses (July 28, 2014);
- 11 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 12 Interrogatories to Sharp (August 4, 2014);
- 13 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 14 2014);
- 15 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 16 Interrogatories to Sharp (August 4, 2014);
- 17 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 18 4, 2014);
- 19 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 20 (August 4, 2014);
- 21 • Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp
- 22 (August 21, 2014);
- 23 • Sharp's Response to Panasonic Corporation of North America's First Set of
- 24 Interrogatories to Sharp (August 21, 2014); and
- 25 • Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp
- 26 (August 25, 2014).
- 27
- 28

Request No. 24:

Separately for each meeting or competitor communication that You Identified in response to Interrogatory Nos. 13 - 23, Identify All evidence upon which You intend to rely to prove that such a meeting or competitor communication resulted in an agreement to “manipulate prices and supply of CRTs sold in the United States”, as alleged in paragraph 253(c) of the Complaint and the Amended Complaint, including:

- (a) All Persons with knowledge suggesting that an agreement to fix target prices, floor prices and price ranges for CRTs was reached;
- (b) The date of each meeting or competitor communication which You contend resulted in an agreement to fix target prices, floor prices and price ranges for CRTs;
- (c) The location of each alleged meeting, if applicable;
- (d) The entities that You contend agreed to the target price, floor price or price range;
- (e) The names of the individuals that You contend participated in each meeting or competitor communication;
- (f) The date of the agreement;
- (g) The type (i.e., CDT or CPT) and model (flat, curved, ITC, bare) of CRT to which the target price, floor price or price range applied;
- (h) The effective date(s) of the target price, floor price or price range;
- (i) The customer(s) to whom the target price, floor price or price range applied;
- (j) The geographic area to which the target price, floor price or price range applied; and
- (k) All evidence upon which You intend to rely to prove such target price, floor price or price range (including the Bates number of each Document and/or citation to specific deposition testimony that You claim supports Your contention).

Response to Request No. 24:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the

1 possession, custody, or control of Defendant, or that can equally or more readily, conveniently,
2 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this
3 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on
4 Sharp to state its entire case on an incomplete record and review and analyze all information
5 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory
6 improperly requires Sharp to marshal evidence in support of its case, including all testimony, in
7 responses to written discovery, but particularly while discovery is ongoing and in advance of the
8 applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects
9 to the extent this interrogatory mischaracterizes the allegations in paragraph 253(c) of the
10 Complaint. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous,
11 overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and
12 duplicative of other discovery propounded in this case, and is therefore in violation of the Order
13 Regarding Discovery and Case Management Protocol (MDL Dkt. No. 1128). Sharp objects to the
14 Interrogatory on the grounds that it violates the Special Master's Report and Recommendation on
15 the Defendants' Motion to Compel, dated August 18, 2014. Sharp also objects to this
16 Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to
17 dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a
18 whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962);
19 *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980)
20 (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for
21 the acts of their co-conspirators and the action of any of the conspirators in furtherance of the
22 conspiracy is, in law, the action of all. *Id.* Moreover, the documentary record is necessarily
23 incomplete because Defendants and co-conspirators concealed the conspiracy by various means
24 and methods, including concealing the existence and nature of their conspiratorial activities and
25 issuing regular instructions to destroy documents relating to the conspiratorial activities. Sharp
26 further objects to the extent this request calls for expert testimony. Moreover, Sharp contends
27 that information exchanges between Defendants and co-conspirators affected prices and thus
28 constitute an antitrust violation under the rule of reason, even in the absence of an express

1 agreement to fix prices. Sharp also objects to the extent that this request calls for information that
2 is covered by attorney-client privilege or the work product protection. Sharp further states that it
3 has not completed its discovery and preparation in this matter and that its investigation of the case
4 is ongoing, and Sharp reserves its right to supplement or amend its response to this Interrogatory
5 consistent with Federal Rule of Civil Procedure 26(e).

6 Subject to and without waiving the foregoing objections, Sharp states that the response to
7 this Interrogatory may include the transactional data and documents produced by defendants, co-
8 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
9 responsive to this Interrogatory from review of the documents and data identified in this response
10 is substantially the same for either Sharp or PENAC. Sharp further states that information
11 responsive to this Interrogatory is contained in the following, which are incorporated here by
12 reference:

- 13 • Exhibit A to these Responses;
- 14 • Attachment A to these Responses;
- 15 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
16 materials;
- 17 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
18 materials;
- 19 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
20 accompanying materials;
- 21 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 22 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 23 • The European Commission Report on the CRT Conspiracy;
- 24 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
25 Set of Interrogatories, No. 5 (February 10, 2012);
- 26 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
27 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
28 2013);

- 1 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 2 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 3 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 4 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 5 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 6 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 7 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 8 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 9 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 10 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 11 of Interrogatories (July 10, 2014);
- 12 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 13 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 14 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 15 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 16 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 17 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 18 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 19 Interrogatories (November 2, 2011);
- 20 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 21 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
- 22 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 23 Interrogatories (December 23, 2011);
- 24 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 25 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 26 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 27 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 28

- 1 • Philips Electronics North America Corporation's Responses to Direct Action
2 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 3 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
4 Interrogatories (May 12, 2010);
- 5 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
6 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 7 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
8 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 9 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
10 (November 25, 2013);
- 11 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
12 Admission (November 25, 2013);
- 13 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
14 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
15 Interrogatories (February 10, 2012);
- 16 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
17 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 18 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
19 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 20 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
21 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
22 those Responses (July 28, 2014);
- 23 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
24 Interrogatories to Sharp (August 4, 2014);
- 25 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
26 2014);
- 27 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
28 Interrogatories to Sharp (August 4, 2014);

- 1 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 2 4, 2014);
- 3 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 4 (August 4, 2014);
- 5 • Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp
- 6 (August 21, 2014);
- 7 • Sharp's Response to Panasonic Corporation of North America's First Set of
- 8 Interrogatories to Sharp (August 21, 2014); and
- 9 • Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp
- 10 (August 25, 2014).

11 **Request No. 25:**

12 Separately for each meeting or competitor communication that You Identified in response
13 to Interrogatory Nos. 13 - 23, Identify all evidence upon which You intend to rely to prove that
14 such a meeting or competitor communication resulted in an agreement to "maintain or lower
15 production capacity" for CRTs, as alleged in paragraph 253(g) of the Complaint and the
16 Amended Complaint, including:

- 17 (a) All Persons with knowledge suggesting that an agreement to maintain or lower
- 18 production capacity for CRTs was reached;
- 19 (b) The date of each meeting or competitor communication which You contend
- 20 resulted in an agreement to maintain or lower production capacity for CRTs;
- 21 (c) The location of each alleged meeting, if applicable;
- 22 (d) The entities that You contend agreed to maintain or lower production capacity for
- 23 CRTs;
- 24 (e) The names of the individuals that You contend participated in each meeting or
- 25 competitor communication;
- 26 (f) The date of the agreement;
- 27 (g) The type (i.e., CDT or CPT) and model (flat, curved, ITC, bare) of CRT to which
- 28 the agreement applied;

- 1 (h) The effective date(s) of the agreement to maintain or lower production capacity for
2 CRTs;
- 3 (i) The geographic area to which the agreement to maintain or lower production
4 capacity for CRTs applied; and
- 5 (j) All evidence upon which You intend to rely to prove that an agreement to maintain
6 or lower production capacity for CRTs was reached (including the Bates number
7 of each Document and/or citation to specific deposition testimony that You claim
8 supports Your contention).

9 **Response to Request No. 25:**

10 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also
11 objects to this Interrogatory to the extent that it calls for information that is already in the
12 possession, custody, or control of Defendant, or that can equally or more readily, conveniently,
13 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this
14 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on
15 Sharp to state its entire case on an incomplete record and review and analyze all information
16 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory
17 improperly requires Sharp to marshal evidence in support of its case, including all testimony, in
18 responses to written discovery, but particularly while discovery is ongoing and in advance of the
19 applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects
20 to the extent this interrogatory mischaracterizes the allegations in paragraph 253(g) of the
21 Complaint. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous,
22 overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and
23 duplicative of other discovery propounded in this case, and is therefore in violation of the Order
24 Regarding Discovery and Case Management Protocol (MDL Dkt. No. 1128). Sharp objects to the
25 Interrogatory on the grounds that it violates the Special Master's Report and Recommendation on
26 the Defendants' Motion to Compel, dated August 18, 2014. Sharp also objects to this
27 Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to
28 dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a

1 whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962);
2 *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980)
3 (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for
4 the acts of their co-conspirators and the action of any of the conspirators in furtherance of the
5 conspiracy is, in law, the action of all. *Id.* Moreover, the documentary record is necessarily
6 incomplete because Defendants and co-conspirators concealed the conspiracy by various means
7 and methods, including concealing the existence and nature of their conspiratorial activities and
8 issuing regular instructions to destroy documents relating to the conspiratorial activities. Sharp
9 further objects to the extent this request calls for expert testimony. Moreover, Sharp contends
10 that information exchanges between Defendants and co-conspirators affected prices and thus
11 constitute an antitrust violation under the rule of reason, even in the absence of an express
12 agreement to fix prices. Sharp also objects to the extent that this request calls for information that
13 is covered by attorney-client privilege or the work product protection. Sharp further states that it
14 has not completed its discovery and preparation in this matter and that its investigation of the case
15 is ongoing, and Sharp reserves its right to supplement or amend its response to this Interrogatory
16 consistent with Federal Rule of Civil Procedure 26(e).

17 Subject to and without waiving the foregoing objections, Sharp states that the response to
18 this Interrogatory may include the transactional data and documents produced by defendants, co-
19 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
20 responsive to this Interrogatory from review of the documents and data identified in this response
21 is substantially the same for either Sharp or PENAC. Sharp further states that information
22 responsive to this Interrogatory is contained in the following, which are incorporated here by
23 reference:

- 24 • Exhibit A to these Responses;
- 25 • Attachment A to these Responses;
- 26 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
27 materials;
- 28

- 1 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
- 2 materials;
- 3 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
- 4 accompanying materials;
- 5 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 6 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 7 • The European Commission Report on the CRT Conspiracy;
- 8 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
- 9 Set of Interrogatories, No. 5 (February 10, 2012);
- 10 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
- 11 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
- 12 2013);
- 13 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 14 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 15 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 16 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 17 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 18 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 19 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 20 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 21 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 22 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 23 of Interrogatories (July 10, 2014);
- 24 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 25 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 26 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 27 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 28

- 1 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
2 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
3 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
4 Interrogatories (November 2, 2011);
- 5 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
6 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
7 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
8 Interrogatories (December 23, 2011);
- 9 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
10 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 11 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
12 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 13 • Philips Electronics North America Corporation's Responses to Direct Action
14 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 15 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
16 Interrogatories (May 12, 2010);
- 17 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
18 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 19 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
20 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 21 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
22 (November 25, 2013);
- 23 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
24 Admission (November 25, 2013);
- 25 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
26 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
27 Interrogatories (February 10, 2012);
- 28

- 1 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 2 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 3 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 4 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 5 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 6 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 7 those Responses (July 28, 2014);
- 8 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 9 Interrogatories to Sharp (August 4, 2014);
- 10 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 11 2014);
- 12 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 13 Interrogatories to Sharp (August 4, 2014);
- 14 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 15 4, 2014);
- 16 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 17 (August 4, 2014);
- 18 • Sharp's Response to LG Electronics U.S.A., Inc.'s First Set of Interrogatories to Sharp
- 19 (August 21, 2014);
- 20 • Sharp's Response to Panasonic Corporation of North America's First Set of
- 21 Interrogatories to Sharp (August 21, 2014); and
- 22 • Sharp's Response to Koninklijke Philips N.V.'s First Set of Interrogatories to Sharp
- 23 (August 25, 2014).
- 24
- 25
- 26
- 27
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1
2 DATED: September 5, 2014 By: /s/ Craig A. Benson

3 Kenneth A. Gallo (*pro hac vice*)
4 Joseph J. Simons (*pro hac vice*)
5 Craig A. Benson (*pro hac vice*)
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